

# EXHIBIT 9

**Index of Employee Declarations**

	<b>Employee Name</b>	<b>Title</b>	<b>Department</b>	<b>Campus</b>
1.	Ash, Linda	Radiologic Tech	K-12 Orthopedics	Main
2.	Boyd, Rachel	Nuclear Medicine Tech	Radiology	Main
3.	Brocker, Nicole	Medical Assistant	Family Medicine	E. Jefferson
4.	Cook, Amy	Sonographer	Radiology	Main
5.	Dansby, Stephanie	LPN	Dialysis	Main
6.	Dudley, Nicole	CNA	IPD	Main
7.	Fletcher, Thomas	Nuclear Medicine Tech	Radiology	Main
8.	Hendrian, Michelle	Radiographer	General – GI Radiology	Main
9.	Kohling, Kathrine	Medical Assistant	Family Medicine	Hamtramck
10.	Lacea, Josephine	LPN	Dialysis	W. Pavilion
11.	Latif, Abdul	Medical Assistant	Family Medicine	Hamtramck
12.	Martin, Curtis	Radiographer	Radiology	Main
13.	Mousouleas, Chelsey	ED Tech	Emergency	Main
14.	Neagu, Patricia	Mammographer	Breast Imaging	NCO
15.	Nicolaou, Angela	Lead Vasc Ultrasound Tech	Vascular Surgery/Lab	Main
16.	Rush, Ranae	Patient Sitter	Clinical Resource	Main
17.	Silver, David	Radiographer	Radiology	Main
18.	Smith, Christa	Medical Assistant	Family Medicine	Hamtramck
19.	Steenbergh, Kimberly	Medical Assistant	Family Medicine	E. Jefferson
20.	Tenenboym, Svetlana	Ultrasound Tech	Radiology	Main

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DANIEL WHALEY,

Plaintiff,  
v

Case No. 2:15-cv-12101  
Hon. David Lawson

HENRY FORD HEALTH SYSTEM,

Defendant.

---

Lance C. Young (P51254)  
Neil B. Pioch (P67677)  
SOMMERS SCHWARTZ, P.C.  
Attorneys for Plaintiff  
One Towne Square, 17th Floor  
Southfield, MI 48076  
(248) 335-0300

Brian Yaldou (P70600)  
THE LAW OFFICE OF BRIAN  
YALDOU  
23000 Telegraph  
Brownstown Twp., MI 48134  
(734) 692-9200

Terrence J. Miglio (P30541)  
Barbara E. Buchanan (P55084)  
VARNUM LLP  
Attorneys for Defendant  
39500 High Pointe Blvd., Ste. 350  
Novi, MI 48375  
(248) 567-7400  
tjmiglio@varnumlaw.com  
bebuchanan@varnumlaw.com

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**DECLARATION OF**

1. My name is LINDA Ash.

2. I make this Declaration based on my personal knowledge. If called as  
a witness, I can competently testify to the facts set forth in this Declaration.

3. I am currently employed with Henry Ford Health System ("HFHS") as a Radiologic technologist in the K-12 orthopedic office at Main Campus. I have been employed with HFHS since 2001.

4. My work uniform is scrubs or \_\_\_\_\_.

5. I do not iron my scrubs/other uniform before coming to work and I have never been disciplined for not doing so.

6. HFHS never told me that I had to iron my scrubs/other uniform.

7. In addition:

yes I wash and dry my scrubs/other uniform at home with my other clothes.

yes I remove my scrubs/other uniform from the drying machine before they become wrinkled.

no My spouse/roommate/significant other/child/parent washes my scrubs/other uniform.

no I use a laundry or dry cleaning service for my scrubs/other uniform.

no I receive my scrubs from the Scrubex service provided by HFHS.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on:

Date: 07/04/15

LINDA ASH  
Name:

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DANIEL WHALEY,

Plaintiff,

v

Case No. 2:15-cv-12101

Hon. David Lawson

HENRY FORD HEALTH SYSTEM,

Defendant.

---

Lance C. Young (P51254)  
Neil B. Pioch (P67677)  
SOMMERS SCHWARTZ, P.C.  
Attorneys for Plaintiff  
One Towne Square, 17th Floor  
Southfield, MI 48076  
(248) 335-0300

Brian Yaldou (P70600)  
THE LAW OFFICE OF BRIAN  
YALDOU  
23000 Telegraph  
Brownstown Twp., MI 48134  
(734) 692-9200

Terrence J. Miglio (P30541)  
Barbara E. Buchanan (P55084)  
VARNUM LLP  
Attorneys for Defendant  
39500 High Pointe Blvd., Ste. 350  
Novi, MI 48375  
(248) 567-7400  
tjmiglio@varnumlaw.com  
bebuchanan@varnumlaw.com

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**DECLARATION OF**

**[INSERT NAME]**

1. My name is Daniel Bale. **[INSERT NAME]**.

2. I make this Declaration based on my personal knowledge. If called as  
a witness, I can competently testify to the facts set forth in this Declaration.

3. I am currently employed with Henry Ford Health System ("HFHS") as  
a Certified Nuclear Medicine Tech **[INSERT JOB TITLE]** in the

Radiology [NAME OF DEPARTMENT/BUSINESS  
UNIT] at HFH - Main [FACILITY NAME]. I have been  
employed with HFHS since 2009 [INSERT DATE OR YEAR].

4. My work uniform is scrubs or \_\_\_\_\_. [IF NOT  
SCRUBS, DESCRIBE UNIFORM].

5. I do not iron my scrubs/other uniform before coming to work and I  
have never been disciplined for not doing so. Agreed

6. HFHS never told me that I had to iron my scrubs/other uniform.

7. In addition: [CHECK ALL THAT APPLY]:

☒ I wash and dry my scrubs/other uniform at home with my other  
clothes.

☒ I remove my scrubs/other uniform from the drying machine  
before they become wrinkled.

☒ My spouse/roommate/significant other/child/parent washes my  
scrubs/other uniform. [CIRCLE AND INITIAL ALL THAT  
APPLY]

\_\_\_ I use a laundry or dry cleaning service for my scrubs/other  
uniform.

\_\_\_ I receive my scrubs from the Scrubex service provided by  
HFHS.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the  
foregoing is true and correct. Executed on:

Date: Aug 5, 2015

Rachel K. Boyd  
Name: [PRINT NAME]

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DANIEL WHALEY,

Plaintiff,

v

Case No. 2:15-cv-12101

Hon. David Lawson

HENRY FORD HEALTH SYSTEM,

Defendant.

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Lance C. Young (P51254)  
Neil B. Pioch (P67677)  
SOMMERS SCHWARTZ, P.C.  
Attorneys for Plaintiff  
One Towne Square, 17th Floor  
Southfield, MI 48076  
(248) 335-0300

Brian Yaldou (P70600)  
THE LAW OFFICE OF BRIAN  
YALDOU  
23000 Telegraph  
Brownstown Twp., MI 48134  
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VARNUM LLP  
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bebuchanan@varnumlaw.com

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**DECLARATION OF**

1. My name is Nicole Brocker.

2. I make this Declaration based on my personal knowledge. If called as  
a witness, I can competently testify to the facts set forth in this Declaration.



3. I am currently employed with Henry Ford Health System ("HFHS") as a medical assistant in the Family Practice Dept at E Jefferson. I have been employed with HFHS since 2001.

4. My work uniform is (scrubs) or \_\_\_\_\_.

5. I do not iron my scrubs/other uniform before coming to work and I have never been disciplined for not doing so.

6. HFHS never told me that I had to iron my scrubs/other uniform.

7. In addition:

☒ I wash and dry my scrubs/other uniform at home with my other clothes.

☒ I remove my scrubs/other uniform from the drying machine before they become wrinkled.

☐ My spouse/roommate/significant other/child/parent washes my scrubs/other uniform.

☐ I use a laundry or dry cleaning service for my scrubs/other uniform.

☐ I receive my scrubs from the Scrubex service provided by HFHS.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on:

Date: 8-4-15

Nicole Brocker  
Name:



UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DANIEL WHALEY,

Plaintiff,

v

Case No. 2:15-cv-12101

Hon. David Lawson

HENRY FORD HEALTH SYSTEM,

Defendant.

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Lance C. Young (P51254)  
Neil B. Pioch (P67677)  
SOMMERS SCHWARTZ, P.C.  
Attorneys for Plaintiff  
One Towne Square, 17th Floor  
Southfield, MI 48076  
(248) 335-0300

Brian Yaldou (P70600)  
THE LAW OFFICE OF BRIAN  
YALDOU  
23000 Telegraph  
Brownstown Twp., MI 48134  
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VARNUM LLP  
Attorneys for Defendant  
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Novi, MI 48375  
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bebuchanan@varnumlaw.com

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**DECLARATION OF** **[INSERT NAME]**

1. My name is Amy Cook. **[INSERT NAME]**.

2. I make this Declaration based on my personal knowledge. If called as  
a witness, I can competently testify to the facts set forth in this Declaration.

3. I am currently employed with Henry Ford Health System ("HFHS") as  
a Sonographer **[INSERT JOB TITLE]** in the

Radiology [NAME OF DEPARTMENT/BUSINESS  
UNIT] at HFH [FACILITY NAME]. I have been  
employed with HFHS since 10 yrs [INSERT DATE OR YEAR].

4. My work uniform is scrubs or \_\_\_\_\_. [IF NOT  
SCRUBS, DESCRIBE UNIFORM].

5. I do not iron my scrubs/other uniform before coming to work and I  
have never been disciplined for not doing so. I agree

6. HFHS never told me that I had to iron my scrubs/other uniform. I agree

7. In addition: [CHECK ALL THAT APPLY]:

☒ I wash and dry my scrubs/other uniform at home with my other  
clothes.

☒ I remove my scrubs/other uniform from the drying machine  
before they become wrinkled.

☐ My spouse/roommate/significant other/child/parent washes my  
scrubs/other uniform. [CIRCLE AND INITIAL ALL THAT  
APPLY]

☐ I use a laundry or dry cleaning service for my scrubs/other  
uniform.

☐ I receive my scrubs from the Scrubex service provided by  
HFHS.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the  
foregoing is true and correct. Executed on:

Date: 8.5.15

Amy Cook RDMS  
Name: [PRINT NAME]

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DANIEL WHALEY,

Plaintiff,

v

Case No. 2:15-cv-12101

Hon. David Lawson

HENRY FORD HEALTH SYSTEM,

Defendant.

---

Lance C. Young (P51254)  
Neil B. Pioch (P67677)  
SOMMERS SCHWARTZ, P.C.  
Attorneys for Plaintiff  
One Towne Square, 17th Floor  
Southfield, MI 48076  
(248) 335-0300

Brian Yaldou (P70600)  
THE LAW OFFICE OF BRIAN  
YALDOU  
23000 Telegraph  
Brownstown Twp., MI 48134  
(734) 692-9200

Terrence J. Miglio (P30541)  
Barbara E. Buchanan (P55084)  
VARNUM LLP  
Attorneys for Defendant  
39500 High Pointe Blvd., Ste. 350  
Novi, MI 48375  
(248) 567-7400  
tjmiglio@varnumlaw.com  
bebuchanan@varnumlaw.com

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**DECLARATION OF** Stefanie Dansby

1. My name is Stefanie Dansby.

2. I make this Declaration based on my personal knowledge. If called as

a witness, I can competently testify to the facts set forth in this Declaration.

3. I am currently employed with Henry Ford Health System ("HFHS") as a LPN in the Dialysis at main Campus. I have been employed with HFHS since 2005.

4. My work uniform is scrubs or Scrubs.

5. I do not iron my scrubs/other uniform before coming to work and I have never been disciplined for not doing so.

6. HFHS never told me that I had to iron my scrubs/other uniform.

7. In addition:

☒ I wash and dry my scrubs/other uniform at home with my other clothes.

☐ I remove my scrubs/other uniform from the drying machine before they become wrinkled.

☐ My spouse/roommate/significant other/child/parent washes my scrubs/other uniform.

☐ I use a laundry or dry cleaning service for my scrubs/other uniform.

☐ I receive my scrubs from the Scrubex service provided by HFHS.

**Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on:**

Date: 8/6/15

[Signature]  
Name:

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DANIEL WHALEY,

Plaintiff,

v

Case No. 2:15-cv-12101

Hon. David Lawson

HENRY FORD HEALTH SYSTEM,

Defendant.

---

Lance C. Young (P51254)  
Neil B. Pioch (P67677)  
SOMMERS SCHWARTZ, P.C.  
Attorneys for Plaintiff  
One Towne Square, 17th Floor  
Southfield, MI 48076  
(248) 335-0300

BRIAN YALDOU (P70600)  
THE LAW OFFICE OF BRIAN  
YALDOU  
23000 Telegraph  
Brownstown Twp., MI 48134  
(734) 692-9200

Terrence J. Miglio (P30541)  
Barbara E. Buchanan (P55084)  
VARNUM LLP  
Attorneys for Defendant  
39500 High Pointe Blvd., Ste. 350  
Novi, MI 48375  
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tjmiglio@varnumlaw.com  
bebuchanan@varnumlaw.com

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**DECLARATION OF**

1. My name is Nicole Dudley

2. I make this Declaration based on my personal knowledge. If called as  
a witness, I can competently testify to the facts set forth in this Declaration.



3. I am currently employed with Henry Ford Health System ("HFHS") as  
a CNA in the IPD  
at HFHS main. I have been employed with HFHS since  
6-27-2011

4. My work uniform is (scrubs) or \_\_\_\_\_.

5. I do not iron my scrubs/other uniform before coming to work and I  
have never been disciplined for not doing so.

6. HFHS never told me that I had to iron my scrubs/other uniform.

7. In addition:

☒ I wash and dry my scrubs/other uniform at home with my other  
clothes.

☒ I remove my scrubs/other uniform from the drying machine  
before they become wrinkled.

☐ My spouse/roommate/significant other/child/parent washes my  
scrubs/other uniform.

☐ I use a laundry or dry cleaning service for my scrubs/other  
uniform.

☐ I receive my scrubs from the Scrubex service provided by  
HFHS.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the  
foregoing is true and correct. Executed on:

Date: 8-3-2015

Nicole Dudley  
Name:

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DANIEL WHALEY,

Plaintiff,

v

Case No. 2:15-cv-12101

Hon. David Lawson

HENRY FORD HEALTH SYSTEM,

Defendant.

---

Lance C. Young (P51254)  
Neil B. Pioch (P67677)  
SOMMERS SCHWARTZ, P.C.  
Attorneys for Plaintiff  
One Towne Square, 17th Floor  
Southfield, MI 48076  
(248) 335-0300

Brian Yaldou (P70600)  
THE LAW OFFICE OF BRIAN  
YALDOU  
23000 Telegraph  
Brownstown Twp., MI 48134  
(734) 692-9200

Terrence J. Miglio (P30541)  
Barbara E. Buchanan (P55084)  
VARNUM LLP  
Attorneys for Defendant  
39500 High Pointe Blvd., Ste. 350  
Novi, MI 48375  
(248) 567-7400  
tjmiglio@varnumlaw.com  
bebuchanan@varnumlaw.com

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**DECLARATION OF** **[INSERT NAME]**

1. My name is THOMAS FLETCHER **[INSERT NAME]**.
2. I make this Declaration based on my personal knowledge. If called as a witness, I can competently testify to the facts set forth in this Declaration.
3. I am currently employed with Henry Ford Health System ("HFHS") as a Nuclear Medicine Technologist **[INSERT JOB TITLE]** in the



Radiology [NAME OF DEPARTMENT/BUSINESS  
UNIT] at HFH [FACILITY NAME]. I have been  
employed with HFHS since 33 days [INSERT DATE OR YEAR].

4. My work uniform is scrubs or \_\_\_\_\_. [IF NOT  
SCRUBS, DESCRIBE UNIFORM].

5. I do not iron my scrubs/other uniform before coming to work and I  
have never been disciplined for not doing so.

6. HFHS never told me that I had to iron my scrubs/other uniform.

7. In addition: [CHECK ALL THAT APPLY]:

Yes I wash and dry my scrubs/other uniform at home with my other  
clothes.

Yes I remove my scrubs/other uniform from the drying machine  
before they become wrinkled.

No My spouse/roommate/significant other/child/parent washes my  
scrubs/other uniform. [CIRCLE AND INITIAL ALL THAT  
APPLY]

No I use a laundry or dry cleaning service for my scrubs/other  
uniform.

No I receive my scrubs from the Scrubex service provided by  
HFHS.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the  
foregoing is true and correct. Executed on:

Date: 05 Aug 2015

JOM FLETCHER  
Name: [PRINT NAME]

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DANIEL WHALEY,

Plaintiff,

v

Case No. 2:15-cv-12101

Hon. David Lawson

HENRY FORD HEALTH SYSTEM,

Defendant.

---

Lance C. Young (P51254)  
Neil B. Pioch (P67677)  
SOMMERS SCHWARTZ, P.C.  
Attorneys for Plaintiff  
One Towne Square, 17th Floor  
Southfield, MI 48076  
(248) 335-0300

Brian Yaldou (P70600)  
THE LAW OFFICE OF BRIAN  
YALDOU  
23000 Telegraph  
Brownstown Twp., MI 48134  
(734) 692-9200

Terrence J. Miglio (P30541)  
Barbara E. Buchanan (P55084)  
VARNUM LLP  
Attorneys for Defendant  
39500 High Pointe Blvd., Ste. 350  
Novi, MI 48375  
(248) 567-7400  
tjmiglio@varnumlaw.com  
bebuchanan@varnumlaw.com

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**DECLARATION OF**

1. My name is Michelle Hendrian RTR.  
Radiographer, Main Campus, OVERTALLS/GI.
2. I make this Declaration based on my personal knowledge. If called as

a witness, I can competently testify to the facts set forth in this Declaration.

3. I am currently employed with Henry Ford Health System ("HFHS") as a Radiographer in the General / GI Radiology at HFH Main Campus. I have been employed with HFHS since 2005.

4. My work uniform is scrubs or Scrubs.

5. I do not iron my scrubs/other uniform before coming to work and I have never been disciplined for not doing so.

6. HFHS never told me that I had to iron my scrubs/other uniform.

7. In addition:

NO I wash and dry my scrubs/other uniform at home with my other clothes.

YES I remove my scrubs/other uniform from the drying machine before they become wrinkled.

NO My spouse/roommate/significant other/child/parent washes my scrubs/other uniform.

NO I use a laundry or dry cleaning service for my scrubs/other uniform.

NO I receive my scrubs from the Scrubex service provided by HFHS.

**Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on:**

Date: August 3, 2015

Michelle Hendrix  
Name: MICHELLE HENDRIX

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DANIEL WHALEY,

Plaintiff,

v

Case No. 2:15-cv-12101

Hon. David Lawson

HENRY FORD HEALTH SYSTEM,

Defendant.

---

Lance C. Young (P51254)  
Neil B. Pioch (P67677)  
SOMMERS SCHWARTZ, P.C.  
Attorneys for Plaintiff  
One Towne Square, 17th Floor  
Southfield, MI 48076  
(248) 335-0300

Brian Yaldou (P70600)  
THE LAW OFFICE OF BRIAN  
YALDOU  
23000 Telegraph  
Brownstown Twp., MI 48134  
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Barbara E. Buchanan (P55084)  
VARNUM LLP  
Attorneys for Defendant  
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Novi, MI 48375  
(248) 567-7400  
tjmiglio@varnumlaw.com  
bebuchanan@varnumlaw.com

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**DECLARATION OF**

1. My name is Katharine Kohling.
2. I make this Declaration based on my personal knowledge. If called as a witness, I can competently testify to the facts set forth in this Declaration.

3. I am currently employed with Henry Ford Health System ("HFHS") as a Medical Assistant in the Family Medicine Dept. at Hamtramck. I have been employed with HFHS since May 2015

4. My work uniform is scrubs or \_\_\_\_\_.

5. I do not iron my scrubs/other uniform before coming to work and I have never been disciplined for not doing so.

6. HFHS never told me that I had to iron my scrubs/other uniform.

7. In addition:

KK

I wash and dry my scrubs/other uniform at home with my other clothes.

\_\_\_ I remove my scrubs/other uniform from the drying machine before they become wrinkled.

\_\_\_ My spouse/roommate/significant other/child/parent washes my scrubs/other uniform.

\_\_\_ I use a laundry or dry cleaning service for my scrubs/other uniform.

\_\_\_ I receive my scrubs from the Scrubex service provided by HFHS.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on:

Date: 8/4/15

Kathrine Kohling  
Name: Kathrine Kohling

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DANIEL WHALEY,

Plaintiff,

v

Case No. 2:15-cv-12101

Hon. David Lawson

HENRY FORD HEALTH SYSTEM,

Defendant.

---

Lance C. Young (P51254)  
Neil B. Pioch (P67677)  
SOMMERS SCHWARTZ, P.C.  
Attorneys for Plaintiff  
One Towne Square, 17th Floor  
Southfield, MI 48076  
(248) 335-0300

Brian Yaldou (P70600)  
THE LAW OFFICE OF BRIAN  
YALDOU  
23000 Telegraph  
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VARNUM LLP  
Attorneys for Defendant  
39500 High Pointe Blvd., Ste. 350  
Novi, MI 48375  
(248) 567-7400  
tjmiglio@varnumlaw.com  
bebuchanan@varnumlaw.com

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**DECLARATION OF**

JOSEPHINE LALEA

1. My name is JOSEPHINE LALEA.

2. I make this Declaration based on my personal knowledge. If called as  
a witness, I can competently testify to the facts set forth in this Declaration.

3. I am currently employed with Henry Ford Health System ("HFHS") as a LPN in the West Pavilion Dialysis at 2014. I have been employed with HFHS since \_\_\_\_\_.

4. My work uniform is scrubs or Scrubs.

5. I do not iron my scrubs/other uniform before coming to work and I have never been disciplined for not doing so.

6. HFHS never told me that I had to iron my scrubs/other uniform.

7. In addition:

☒ I wash and dry my scrubs/other uniform at home with my other clothes.

☒ I remove my scrubs/other uniform from the drying machine before they become wrinkled.

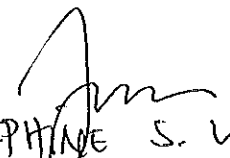
☐ My spouse/roommate/significant other/child/parent washes my scrubs/other uniform.

☐ I use a laundry or dry cleaning service for my scrubs/other uniform.

☒ I receive my scrubs from the Scrubex service provided by HFHS.

**Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on:**

Date: 8/5/15

  
JOSEPHINE S. LAVEA  
Name:



UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DANIEL WHALEY,

Plaintiff,

v

Case No. 2:15-cv-12101

Hon. David Lawson

HENRY FORD HEALTH SYSTEM,

Defendant.

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Lance C. Young (P51254)  
Neil B. Pioch (P67677)  
SOMMERS SCHWARTZ, P.C.  
Attorneys for Plaintiff  
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YALDOU  
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Barbara E. Buchanan (P55084)  
VARNUM LLP  
Attorneys for Defendant  
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Novi, MI 48375  
(248) 567-7400  
tjmiglio@varnumlaw.com  
bebuchanan@varnumlaw.com

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**DECLARATION OF**

1. My name is Abdul Latif.

2. I make this Declaration based on my personal knowledge. If called as  
a witness, I can competently testify to the facts set forth in this Declaration.

3. I am currently employed with Henry Ford Health System ("HFHS") as a medical Assistant in the Family Medicine at Hemlock. I have been employed with HFHS since 11/2001.

4. My work uniform is scrubs or \_\_\_\_\_.

5. I do not iron my scrubs/other uniform before coming to work and I have never been disciplined for not doing so.

6. HFHS never told me that I had to iron my scrubs/other uniform.

7. In addition:

☒ I wash and dry my scrubs/other uniform at home with my other clothes.

☐ I remove my scrubs/other uniform from the drying machine before they become wrinkled.

☐ My spouse/roommate/significant other/child/parent washes my scrubs/other uniform.

☐ I use a laundry or dry cleaning service for my scrubs/other uniform.

☐ I receive my scrubs from the Scrubex service provided by HFHS.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on:

Date: 8/11/15

Abdul Laby  
Name:

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DANIEL WHALEY,

Plaintiff,

v

Case No. 2:15-cv-12101

Hon. David Lawson

HENRY FORD HEALTH SYSTEM,

Defendant.

---

Lance C. Young (P51254)  
Neil B. Pioch (P67677)  
SOMMERS SCHWARTZ, P.C.  
Attorneys for Plaintiff  
One Towne Square, 17th Floor  
Southfield, MI 48076  
(248) 335-0300

Brian Yaldou (P70600)  
THE LAW OFFICE OF BRIAN  
YALDOU  
23000 Telegraph  
Brownstown Twp., MI 48134  
(734) 692-9200

Terrence J. Miglio (P30541)  
Barbara E. Buchanan (P55084)  
VARNUM LLP  
Attorneys for Defendant  
39500 High Pointe Blvd., Ste. 350  
Novi, MI 48375  
(248) 567-7400  
tjmiglio@varnumlaw.com  
bebuchanan@varnumlaw.com

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**DECLARATION OF** **[INSERT NAME]**

1. My name is CURTIS MARTIN. **[INSERT NAME]**.

2. I make this Declaration based on my personal knowledge. If called as  
a witness, I can competently testify to the facts set forth in this Declaration.

3. I am currently employed with Henry Ford Health System ("HFHS") as  
a RADIOGRAPHER **[INSERT JOB TITLE]** in the

RADIOLOGY

[NAME OF DEPARTMENT/BUSINESS

UNIT] at HFH [FACILITY NAME]. I have been employed with HFHS since 7 YEARS [INSERT DATE OR YEAR].

4. My work uniform is scrubs or \_\_\_\_\_. [IF NOT SCRUBS, DESCRIBE UNIFORM].

5. I do not iron my scrubs/other uniform before coming to work and I have never been disciplined for not doing so. / AGREE

6. HFHS never told me that I had to iron my scrubs/other uniform. / AGREE

7. In addition: [CHECK ALL THAT APPLY]:

YES ☒ I wash and dry my scrubs/other uniform at home with my other clothes.

YES ☒ I remove my scrubs/other uniform from the drying machine before they become wrinkled.

YES ☒ My spouse/roommate/significant other/child/parent washes my scrubs/other uniform. [CIRCLE AND INITIAL ALL THAT APPLY]

NO ☐ I use a laundry or dry cleaning service for my scrubs/other uniform.

NO ☐ I receive my scrubs from the Scrubex service provided by HFHS.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on:

Date: 8/5/15

Name: [PRINT NAME]

CURTIS A MARTIN

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DANIEL WHALEY,

Plaintiff,

v

Case No. 2:15-cv-12101

Hon. David Lawson

HENRY FORD HEALTH SYSTEM,

Defendant.

---

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SOMMERS SCHWARTZ, P.C.  
Attorneys for Plaintiff  
One Towne Square, 17th Floor  
Southfield, MI 48076  
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THE LAW OFFICE OF BRIAN  
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Attorneys for Defendant  
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Novi, MI 48375  
(248) 567-7400  
tjmiglio@varnumlaw.com  
bebuchanan@varnumlaw.com

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DECLARATION OF Chelsey Mousouleas

1. My name is Chelsey Mousouleas
2. I make this Declaration based on my personal knowledge. If called as  
a witness, I can competently testify to the facts set forth in this Declaration.

3. I am currently employed with Henry Ford Health System ("HFHS") as a ER-Tech in the ER at Main Campus. I have been employed with HFHS since 1 year.

4. My work uniform is scrubs or Scrubs.

5. I do not iron my scrubs/other uniform before coming to work and I have never been disciplined for not doing so.

6. HFHS never told me that I had to iron my scrubs/other uniform.

7. In addition:

☒ I wash and dry my scrubs/other uniform at home with my other clothes.

☐ I remove my scrubs/other uniform from the drying machine before they become wrinkled.

☐ My spouse/roommate/significant other/child/parent washes my scrubs/other uniform.

☐ I use a laundry or dry cleaning service for my scrubs/other uniform.

☐ I receive my scrubs from the Scrubex service provided by HFHS.

**Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on:**

Date: 8/4/2015

[Signature]  
Name:

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DANIEL WHALEY,

Plaintiff,

v

Case No. 2:15-cv-12101

Hon. David Lawson

HENRY FORD HEALTH SYSTEM,

Defendant.

---

Lance C. Young (P51254)  
Neil B. Pioch (P67677)  
SOMMERS SCHWARTZ, P.C.  
Attorneys for Plaintiff  
One Towne Square, 17th Floor  
Southfield, MI 48076  
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THE LAW OFFICE OF BRIAN  
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Novi, MI 48375  
(248) 567-7400  
tjmiglio@varnumlaw.com  
bebuchanan@varnumlaw.com

---

**DECLARATION OF**

1. My name is PATRICIA NEAGU.

2. I make this Declaration based on my personal knowledge. If called as  
a witness, I can competently testify to the facts set forth in this Declaration.



3. I am currently employed with Henry Ford Health System ("HFHS") as a Mammographer in the Breast Imaging at NCO. I have been employed with HFHS since 2012.

4. My work uniform is scrubs or scrubs.

5. I do not iron my scrubs/other uniform before coming to work and I have never been disciplined for not doing so. correct

6. HFHS never told me that I had to iron my scrubs/other uniform. correct

7. In addition:

Yes I wash and dry my scrubs/other uniform at home with my other clothes.

Yes I remove my scrubs/other uniform from the drying machine before they become wrinkled.

No My spouse/roommate/significant other/child/parent washes my scrubs/other uniform.

No I use a laundry or dry cleaning service for my scrubs/other uniform.

No I receive my scrubs from the Scrubex service provided by HFHS.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on:

Date: 8.4.2015

PATRICIA NEAGU  
Name:

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DANIEL WHALEY,

Plaintiff,

v

Case No. 2:15-cv-12101

Hon. David Lawson

HENRY FORD HEALTH SYSTEM,

Defendant.

---

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SOMMERS SCHWARTZ, P.C.  
Attorneys for Plaintiff  
One Towne Square, 17th Floor  
Southfield, MI 48076  
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THE LAW OFFICE OF BRIAN  
YALDOU  
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Attorneys for Defendant  
39500 High Pointe Blvd., Ste. 350  
Novi, MI 48375  
(248) 567-7400  
tjmiglio@varnumlaw.com  
bebuchanan@varnumlaw.com

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**DECLARATION OF Angela Nicolaou**

1. My name is Angela Nicolaou.
2. I make this Declaration based on my personal knowledge. If called as a witness, I can competently testify to the facts set forth in this Declaration.

3. I am currently employed with Henry Ford Health System ("HFHS") as a Lead Vascular Ultrasound Technologist in the Vascular Lab at Henry Ford Hospital. I have been employed with HFHS since 2002.

4. My work uniform is scrubs.

5. I do not iron my scrubs/other uniform before coming to work and I have never been disciplined for not doing so.

6. HFHS never told me that I had to iron my scrubs/other uniform.

7. In addition:

☒ X I wash and dry my scrubs/other uniform at home with my other clothes.

☒ X I remove my scrubs/other uniform from the drying machine before they become wrinkled.

☐ My spouse/roommate/significant other/child/parent washes my scrubs/other uniform.

☐ I use a laundry or dry cleaning service for my scrubs/other uniform.

☐ I receive my scrubs from the Scrubex service provided by HFHS.

**Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on:**

Date: 8/4/2015

  
Name: Angela Nicolaou

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DANIEL WHALEY,

Plaintiff,

v

Case No. 2:15-cv-12101

Hon. David Lawson

HENRY FORD HEALTH SYSTEM,

Defendant.

---

Lance C. Young (P51254)  
Neil B. Pioch (P67677)  
SOMMERS SCHWARTZ, P.C.  
Attorneys for Plaintiff  
One Towne Square, 17th Floor  
Southfield, MI 48076  
(248) 335-0300

Brian Yaldou (P70600)  
THE LAW OFFICE OF BRIAN  
YALDOU  
23000 Telegraph  
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Barbara E. Buchanan (P55084)  
VARNUM LLP  
Attorneys for Defendant  
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Novi, MI 48375  
(248) 567-7400  
tjmiglio@varnumlaw.com  
bebuchanan@varnumlaw.com

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**DECLARATION OF**

Renae Rush

1. My name is Renae Rush.

2. I make this Declaration based on my personal knowledge. If called as  
a witness, I can competently testify to the facts set forth in this Declaration.

3. I am currently employed with Henry Ford Health System ("HFHS") as  
a Patient Sitter in the Clinical Resource Office  
at HENRY Ford Main I have been employed with HFHS since  
11/2002.

4. My work uniform is scrubs or \_\_\_\_\_.

5. I do not iron my scrubs/other uniform before coming to work and I  
have never been disciplined for not doing so.

6. HFHS never told me that I had to iron my scrubs/other uniform.

7. In addition:

☒ I wash and dry my scrubs/other uniform at home with my other  
clothes. I wash my uniforms with uniforms  
only.

☐ I remove my scrubs/other uniform from the drying machine  
before they become wrinkled.

☐ My spouse/roommate/significant other/child/parent washes my  
scrubs/other uniform.

☐ I use a laundry or dry cleaning service for my scrubs/other  
uniform.

☐ I receive my scrubs from the Scrubex service provided by  
HFHS.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the  
foregoing is true and correct. Executed on:

Date: 8/4/15

Ronae Rust  
Name:

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DANIEL WHALEY,

Plaintiff,

v

Case No. 2:15-cv-12101

Hon. David Lawson

HENRY FORD HEALTH SYSTEM,

Defendant.

---

Lance C. Young (P51254)  
Neil B. Pioch (P67677)  
SOMMERS SCHWARTZ, P.C.  
Attorneys for Plaintiff  
One Towne Square, 17th Floor  
Southfield, MI 48076  
(248) 335-0300

Brian Yaldou (P70600)  
THE LAW OFFICE OF BRIAN  
YALDOU  
23000 Telegraph  
Brownstown Twp., MI 48134  
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Terrence J. Miglio (P30541)  
Barbara E. Buchanan (P55084)  
VARNUM LLP  
Attorneys for Defendant  
39500 High Pointe Blvd., Ste. 350  
Novi, MI 48375  
(248) 567-7400  
tjmiglio@varnumlaw.com  
bebuchanan@varnumlaw.com

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**DECLARATION OF**

**[INSERT NAME]**

1. My name is David Silver. **[INSERT NAME]**.

2. I make this Declaration based on my personal knowledge. If called as  
a witness, I can competently testify to the facts set forth in this Declaration.

3. I am currently employed with Henry Ford Health System ("HFHS") as  
a Radiographer **[INSERT JOB TITLE]** in the

Radiology [NAME OF DEPARTMENT/BUSINESS  
UNIT] at HFH [FACILITY NAME]. I have been  
employed with HFHS since 1993 [INSERT DATE OR YEAR].

4. My work uniform is scrubs or yes. [IF NOT  
SCRUBS, DESCRIBE UNIFORM].

5. I do not iron my scrubs/other uniform before coming to work and I  
have never been disciplined for not doing so. yes

6. HFHS never told me that I had to iron my scrubs/other uniform. yes

7. In addition: [CHECK ALL THAT APPLY]:

☒ I wash and dry my scrubs/other uniform at home with my other  
clothes.

☒ I remove my scrubs/other uniform from the drying machine  
before they become wrinkled.

☐ My spouse/roommate/significant other/child/parent washes my  
scrubs/other uniform. [CIRCLE AND INITIAL ALL THAT  
APPLY]

☒ I use a laundry or dry cleaning service for my scrubs/other  
uniform.

☒ I receive my scrubs from the Scrubex service provided by  
HFHS.

**Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the  
foregoing is true and correct. Executed on:**

Date: 8/5/15

David Silver  
Name: [PRINT NAME]



UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DANIEL WHALEY,

Plaintiff,

v

Case No. 2:15-cv-12101

Hon. David Lawson

HENRY FORD HEALTH SYSTEM,

Defendant.

---

Lance C. Young (P51254)  
Neil B. Pioch (P67677)  
SOMMERS SCHWARTZ, P.C.  
Attorneys for Plaintiff  
One Towne Square, 17th Floor  
Southfield, MI 48076  
(248) 335-0300

Brian Yaldou (P70600)  
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YALDOU  
23000 Telegraph  
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VARNUM LLP  
Attorneys for Defendant  
39500 High Pointe Blvd., Ste. 350  
Novi, MI 48375  
(248) 567-7400  
tjmiglio@varnumlaw.com  
bebuchanan@varnumlaw.com

---

**DECLARATION OF**

1. My name is Christa Smith.
2. I make this Declaration based on my personal knowledge. If called as a witness, I can competently testify to the facts set forth in this Declaration.

3. I am currently employed with Henry Ford Health System ("HFHS") as a Medical Assistant in the Family Practice Department at Hamtramck. I have been employed with HFHS since 2000.

4. My work uniform is scrubs or \_\_\_\_\_.

5. I do not iron my scrubs/other uniform before coming to work and I have never been disciplined for not doing so.

6. HFHS never told me that I had to iron my scrubs/other uniform.

7. In addition:

☒ I wash and dry my scrubs/other uniform at home with my other clothes.

☐ I remove my scrubs/other uniform from the drying machine before they become wrinkled.

☐ My spouse/roommate/significant other/child/parent washes my scrubs/other uniform.

☐ I use a laundry or dry cleaning service for my scrubs/other uniform.

☐ I receive my scrubs from the Scrubex service provided by HFHS.

**Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on:**

Date: 8/4/2015

  
Name:

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DANIEL WHALEY,

Plaintiff,

v

Case No. 2:15-cv-12101

Hon. David Lawson

HENRY FORD HEALTH SYSTEM,

Defendant.

---

Lance C. Young (P51254)  
Neil B. Pioch (P67677)  
SOMMERS SCHWARTZ, P.C.  
Attorneys for Plaintiff  
One Towne Square, 17th Floor  
Southfield, MI 48076  
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(248) 567-7400  
tjmiglio@varnumlaw.com  
bebuchanan@varnumlaw.com

---

**DECLARATION OF**

1. My name is Kimberly Steenbergh

2. I make this Declaration based on my personal knowledge. If called as

a witness, I can competently testify to the facts set forth in this Declaration.

3. I am currently employed with Henry Ford Health System ("HFHS") as a Medical assistant in the family medicine dept at HFH E. Jefferson. I have been employed with HFHS since 1994.

4. My work uniform is scrubs or \_\_\_\_\_.

5. I do not iron my scrubs/other uniform before coming to work and I have never been disciplined for not doing so.

6. HFHS never told me that I had to iron my scrubs/other uniform.

7. In addition:

☒ I wash and dry my scrubs/other uniform at home with my other clothes.

☒ I remove my scrubs/other uniform from the drying machine before they become wrinkled.

☒ My ~~spouse~~ roommate/significant other/child/parent washes my scrubs/other uniform.

☐ I use a laundry or dry cleaning service for my scrubs/other uniform.

☐ I receive my scrubs from the Scrubex service provided by HFHS.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on:

Date: 8-4-15

Kimberly Skelley  
Name:

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DANIEL WHALEY,

Plaintiff,

v

Case No. 2:15-cv-12101

Hon. David Lawson

HENRY FORD HEALTH SYSTEM,

Defendant.

---

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Neil B. Pioch (P67677)  
SOMMERS SCHWARTZ, P.C.  
Attorneys for Plaintiff  
One Towne Square, 17th Floor  
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THE LAW OFFICE OF BRIAN  
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Barbara E. Buchanan (P55084)  
VARNUM LLP  
Attorneys for Defendant  
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Novi, MI 48375  
(248) 567-7400  
tjmiglio@varnumlaw.com  
bebuchanan@varnumlaw.com

---

**DECLARATION OF** **[INSERT NAME]**

1. My name is SVETLANA TENENBOYK. **[INSERT NAME]**.
2. I make this Declaration based on my personal knowledge. If called as a witness, I can competently testify to the facts set forth in this Declaration.
3. I am currently employed with Henry Ford Health System ("HFHS") as a Ultrasound tech **[INSERT JOB TITLE]** in the

Radiology [NAME OF DEPARTMENT/BUSINESS  
UNIT] at HFH [FACILITY NAME]. I have been  
employed with HFHS since 2005 [INSERT DATE OR YEAR].

4. My work uniform is scrubs or \_\_\_\_\_. [IF NOT  
SCRUBS, DESCRIBE UNIFORM].

5. I do not iron my scrubs/other uniform before coming to work and I  
have never been disciplined for not doing so. Agree

6. HFHS never told me that I had to iron my scrubs/other uniform. Agree

7. In addition: [CHECK ALL THAT APPLY]:

☒ I wash and dry my scrubs/other uniform at home with my other  
clothes.

☒ I remove my scrubs/other uniform from the drying machine  
before they become wrinkled.

☐ My spouse/roommate/significant other/child/parent washes my  
scrubs/other uniform. [CIRCLE AND INITIAL ALL THAT  
APPLY]

☐ I use a laundry or dry cleaning service for my scrubs/other  
uniform.

☐ I receive my scrubs from the Scrubex service provided by  
HFHS.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the  
foregoing is true and correct. Executed on:

Date: 8/5/15

Svetlana TENENBOYK  
Name: [PRINT NAME]